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Rogers Cartage

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U.S. Environmental Protection Agency
Region V
Chicago, IL 60604

Contract No. 68-01-6421
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EPA Project Officer

Irvin J. Dsikowski

DETAILED PROCESS EVALUATION
OF SELECTED INDUSTRIAL WASTE
TOXICANT DISCHARGERS TO THE
SAUGET, ILLINOIS POTW

Draft Final Report

August 1982

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CER 127218

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| AUG 11 1982 | | DETERMINATION |

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SECTION 4

ROGERS CARTAGE CO.

PROCESS DESCRIPTION

Rogers Cartage is a transporter of a variety of chemical products from producer to consumer in the food, petroleum, plastics and pharmaceutical industries. The Sauget terminal provides facilities for tank truck cleaning; internal and some external cleaning is performed. On a normal, 6-day per week operation, 70 to 75 trucks are cleaned.

Certain trucks are designated as "dedicated" for transporting specific products. Dedicated trucks are not cleaned at the Sauget terminal, however, when truck cleaning becomes necessary (repairs or maintenance required) dedicated trucks are sent to a truck cleaning facility in Texas. The material cleaned from the truck at the Texas facility is drummed and transported to an incinerator in Baton Rouge, LA (Rollins Environmental Services).

Depending on the type of material transported, two tank (internal) cleaning methods are used: (1) hot caustic wash with hot water rinse, or (2) hot water rinse. Figure 6 is a flow diagram of the cleaning process at Rogers Cartage. Table 9 lists the commodities hauled and cleaning methods used over a 1-month period. External portions of the truck are cleaned periodically (as needed basis) with a stainless steel cleaning solution.

Hot Caustic Wash

Hot caustic wash (50 percent solution NaOH) is recirculated via a 500-gallon holding tank. The solution is delivered (under pressure) into the truck via a rotating spray nozzle. The caustic holding tank is discharged to the sewer every 3 weeks. Periodically make-up water and caustic are added to the holding tank to maintain a 500-gallon level. Hot caustic wash is used when materials have a high insolubility or low affinity to hot water alone, such as petroleum products, oil-based materials and plastic resins.

Hot Water Rinse

All trucks are rinsed with approximately 500 gallons of hot water. Hot water (city water) is kept in a 1,000-gallon holding tank and maintained at approximately 190°F. Trucks are spray cleaned in a manner similar to hot caustic wash. Hot water is discharged to the sewer after each rinse.

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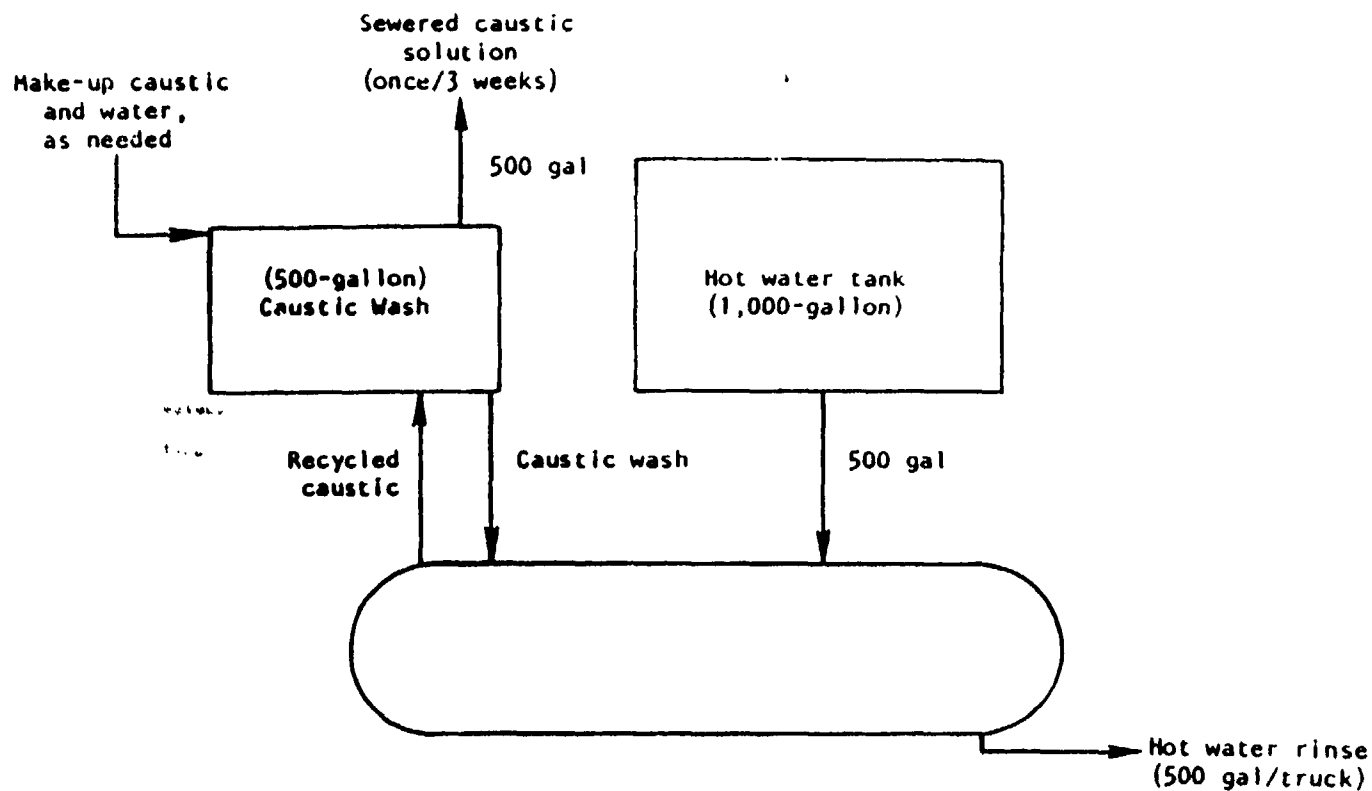
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| CONFIDENTIALITY | Agency Contact: Jon Barney | DO NOT RELEASE |
| CLAIM | Date of Claim: August 1, 1982 | WITHOUT FOIA |
| ANSWERED | Claim By: See page 11 | DETERMINATION |

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| CONFIDENTIALITY | | APPROVED FOR RELEASE | |
| CLASS | DATE OF CLASS. AUGUST 1, 1962 | WITHDC: POLA | RETERMINATION |
| CLASS. BY: see page 11 | | | |

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Approximate Daily Sewer Discharge = 6000 gpd (based on 12 trucks cleaned/day)
(for truck cleaning only)

Figure 6. Flow diagram of Rogers Cartage truck cleaning process.

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TABLE 9. REPRESENTATIVE CROSS-SECTION OF MATERIALS TRANSPORTED BY ROGERS
CARTAGE CO. OVER A 1-MONTH PERIOD^a

| Commodity/ Trade Name | No. of trucks served | Type of wash | | Comments | Toxicity level |
|----------------------------|----------------------------|--------------|-----------|---------------------------|--|
| | | Acoustic | Hot water | | |
| Formaldehyde | 4 | | x | | LD ₅₀ = 16 mg/kg (human) TLM 96 = 100-10 ppm |
| Deicer | 4 | | x | • Airline deicer fluid | |
| Alum | 8 | x | x | | |
| Dibutyl hydrogen phosphate | 1 | | x | | LD ₅₀ = 3200 mg/kg (rat) |
| Muriatic acid | 3 | | x | • Commercial grade of HCl | LD ₅₀ = 81 mg/kg (human) |
| Silicate | 2 | | x | | |
| Fatty acid | 11 | | x | • (soap) | |
| Phosphoric acid | 3 | | x | | LD ₅₀ = 1530 mg/kg (rat) TLM 96 = 100-10 ppm |
| Zinc sulfate solution | 2 | | x | | TDLo = 45 mg/kg (human) |
| Triethylene glycol | 1 | | x | | LD ₅₀ = 17 g/kg (rat) TLM 96 = over 1000 ppm |
| Polypropylene glycol | 1 | | x | | LD ₅₀ = 15-9760 mg/kg (rat) ^c |
| Caustic | 14 | | x | | LDLo = 500 mg/kg (rabbit) TLM 96 = 100-10 ppm |
| Can coating | 5 | | x | • Water soluble resin | |
| Polymer | 3 | x | x | | LD ₅₀ = 25 g/kg (rat) ^d |
| Plasticizer | 11 | x | x | | LD ₅₀ = 18-8720 mg/kg (rat) ^c |
| Resin | 2 | x | x | | |
| Linseed oil | 1 | x | x | • Used in paint industry | |
| Hydraulic oil | 1 | x | x | | |
| Mineral spirits | 1 | | x | | LDLo = 1470 mg/kg (human) TLM 96 = over 1000 ppm |

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| ASBESTOS | DATE: 1/1/81 | BY: J. B. BARRY |
| CLARK | DATE: 1/1/81 | BY: J. B. BARRY |
| CLARK | DATE: 1/1/81 | BY: J. B. BARRY |

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TABLE 9 (continued)

| Commodity/ Trade Name | No. of trucks serviced | Type of wash | | Comments | Toxicity level ¹⁾ |
|--------------------------|------------------------------|--------------|-----------|---|--|
| | | Caustic | Hot water | | |
| Petroleum naphtha | 1 | | x | • Aromatic solvent | LDLo = 2000 mg/kg (hamster) |
| Xylene/Benzene | 1 | | x | • Trace quantities of benzene | Xylene - LD ₅₀ = 4300 mg/kg (rat) Benzene - LDLo = 130 mg/kg (human) Tlm 96 = 100-10 ppm (for both) |
| Phenol | 3 | | x | | LDLo = 140 mg/kg (human) Tlm 96 = 100-10 ppm |
| Alcohol | 1 | | x | | |
| Alkane | 1 | x | x | | LD ₅₀ = 6856-12,780 mg/kg (mouse) ¹⁾ |
| Flucon | 13 | x | x | • oil drilling fluid | |
| Santochlor | 2 | | x | • (dichlorobenzene) • Used in the production of moth balls | TDLo = 300 mg/kg (human) |
| Soap | 11 | | x | | |
| Sanderite | 1 | | x | • Metal cleaner | |
| Process oil | 1 | x | x | | |
| Motor oil | 2 | x | x | | |
| Crude treating compound | 21 | x | x | • Descaler (combustible) | |
| Black oil | 1 | x | x | • Road oil (heavy oil) | |
| Skim oil | 1 | x | x | • API separator | |
| Soybean oil | 11 | | x | | |
| Lard | 1 | | x | | |
| Fatty alcohols | 1 | | x | | |
| Food grade oil | 1 | | x | | |

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CONFIDENTIALITY

APPROVAL
Date of Claim: August 1, 1982
Claim by: See page 11

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TABLE 9 (continued)

| Commodity/ Trade Name | No. of trucks served | Type of wash | | Remarks | Toxicity level ^b |
|---------------------------|----------------------------|--------------|-----------|-------------------------|-----------------------------|
| | | Caustic | Hot water | | |
| Paint increasing compound | 5 | x | x | * Contains same solvent | |
| Paint (enamel) | 1 | x | x | | 1200 - 2000 mg/kg (oral) |

^aDoes not include material carried in "dedicated" trucks.

^bSource: Reference 4.

^cToxicity range reported for various mixtures of polypropylene glycol designated by the following numbers: 150, 400, 425, 750, 1025, 1200, 2025, 3025, and 4025.

^dToxicity reported for Polymer X-150.

^eToxicity range reported for various plasticizers designated as: C-316, 400, GPe, and 786.

^fToxicity range reported for Alkanes 56, 60, and 6.

^gToxicity reported for enamel white (barium sulfate).

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| AVAILABILITY | NO NOT RELEASE |
| CLAIM | WITHOUT PAYA |
| APPROVED | DETERMINATION |

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WASTE STREAM ANALYSIS

The data in Table 9 indicate the variety of compounds and the types of cleaning performed at Rogers Cartage. GCA estimates that approximately 600 gallons of wastewater from tank truck washing is generated daily based on cleaning an average of 12 trucks per day. A recent study¹¹ of tank truck wash operations showed highly variable pollutant characteristics given in Table 10.

The variability ratio in Table 10 represents the probably ratio of expected high to expected low values. The variability of volume and characteristics of wastewater from tank truck cleaning can be attributed to:

- Type and amount of material remaining in the truck after delivery (referred to as the heel).
- Type of wash performed.
- Number of trucks serviced.

The amount of material in the truck prior to cleaning, designated as the "heel", is a function of the following chemical-physical characteristics of the material:

- viscosity
- volatility (vapor pressure)
- density

Occasionally, products delivered by Rogers Cartage may not be entirely accepted by the consignee, simply due to the lack of storage facilities. In this case, the Rogers employee is required to inform the Saugat terminal to report the amount of "heel" undeliverable and arrangements are made with the shipper (product origin) to return the undelivered portion. Under no conditions are heels of substantial quantity returned to or serviced by Rogers Cartage.

It is conceivable that some quantity of heel (1 to 5 gallons) may be present in a truck due to the physical-chemical properties mentioned above. Highly viscous materials, such as petroleum-related products and oil-based fluids, will not drain as easily as low viscosity materials. High vapor pressure (low boiling point) materials will contribute little or no residual in the tank and will volatilize more readily during hot wash cleanings.

WASTE STREAM TOXICITY EVALUATION

A review of compounds presented in Table 9 indicate the presence of some priority pollutants; i.e., zinc (from zinc sulfate solution), phenol, xylene/benzene. Formaldehyde is also regarded as an atmospheric toxicant. The quantity of these compounds remaining as residual is probably very small

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| TOXICITY | Approved Date: June 8, 1987 Date of Closure: August 1, 1982 Class By: See page 11 | DO NOT RELEASE WITHOUT POSA DETERMINATION |
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(1 gallon or less). Xylene by itself is not considered a priority pollutant, however, in the production of xylene trace quantities of benzene are normally present.

TABLE 10. RAW WASTEWATER FROM TANK TRUCK WASH OPERATIONS^a

| | Mean | Variability ratio ^b |
|-------------------------|--------|--------------------------------|
| Flow, gal/tanker washed | 1,390 | 6 |
| BOD ₅ , mg/L | 2,800 | 3 |
| COD, mg/L | 12,000 | 3 |
| SS, mg/L | 4,035 | 19 |
| Phenols, mg/L | 29 | 12 |

^aSource: Reference 11.

^bRatio is generated using monthly average values at 5 terminals. Each value is an average of 3 to 6 daily composite values taken that month. Values at 90 percent level of occurrence are divided by those at 10 percent level of occurrence to produce the variability ratio.

Residual quantity is the major factor in determining waste stream toxicity. Small quantities of light hydrocarbons (formaldehyde, benzene, etc.) may not pose a significant threat to wastewater quality. Hot water cleaning (at 190°F) may cause substantial evaporation of low boiling point compounds.

Virtually all water pollutants are removed from the truck's tank during the caustic wash cycle. Subsequent rinsing with hot water may add trace quantities of caustic washing solution to the waste stream.

MONITORING PLAN

At present, Rogers Cartage is not monitored by the Sauget POTW for flow or composite sampling due to Rogers Cartage low discharge rate (approximately 6000 gpd, based on 12 truck cleanings per day). High pH excursions during discharge of caustic solution are not a main concern of the treatment facility, according to the chief operator, because the Sauget POTW generally handles wastes which are acidic in nature. Currently, Rogers Cartage informs the Sauget POTW prior to a caustic discharge.

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| COMMUNITY | Agency: Joe Barney | DO NOT RELEASE |
| PLANT | Date: August 1, 1982 | WITHOUT FOIA |
| PROJECT | Class: E-100-11 | DETERMINATION |

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| LOCALITY | ACTIVITY | DO NOT RELEASE |
| DATE | DATE OF VISIT | WITHOUT POLICE |
| REPORT BY | DATE OF VISIT: June 1, 1962 | DEFINITION |
| | CLIP BY: See page 15 | |

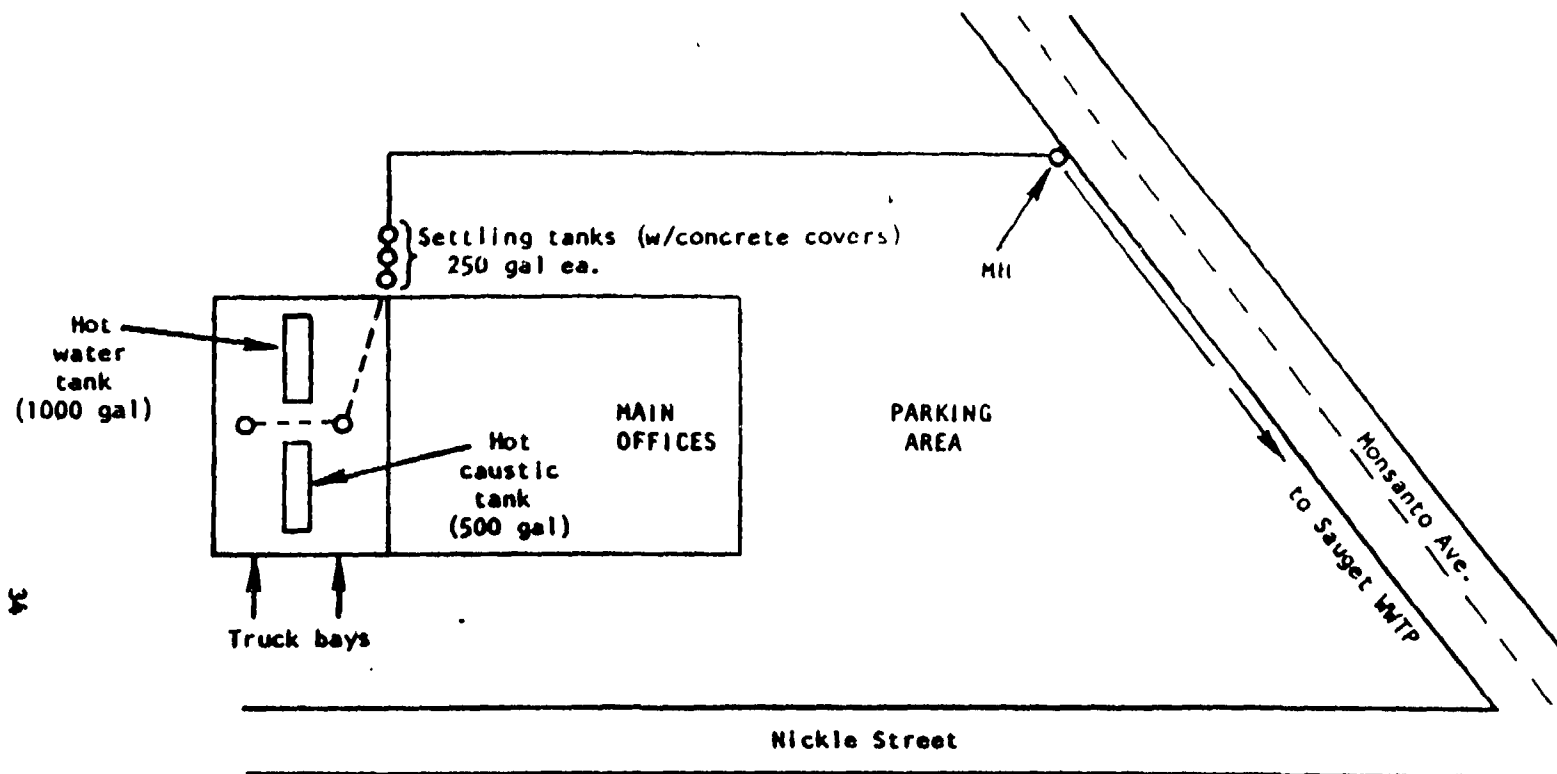


Figure 7. Plant layout for Rogers Cartage Co. (Sketch not to scale).

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The nature of tank truck wastewater generated by Rogers Cartage may be potentially toxic and could be characterized by an extensive monitoring program. Grab samples of Rogers Cartage effluent could be obtained from the settling tanks shown in Figure 7. However, results from grab sampling would tend to be specific to the type of truck most recently washed. Accurate characterization of Rogers Cartage wastewater would require the use of a flow actuated automatic sampler located in the manhole on Monsanto Ave., just outside the plant.

GCA's assessment of sampling point locations necessary for process segregation are summarized in Table 11. For process segregation, it will be necessary to sample at the outlet port from the truck being washed. This will enable separate results for hot caustic and hot water washes. Note that hot caustic solution (recycled) samples may only be representative of a specific time, dependent on the number and types of trucks cleaned and the age of the solution.

TABLE 11. SAMPLING POINT LOCATIONS--ROGER'S CARTAGE

| Sample point | Process | Comments |
|-----------------|----------------------|--|
| Truck drain | Hot caustic solution | Recirculated solution is discharged to sewer every 3 weeks. |
| Truck drain | Hot water rinse | Hot water rinse is used exclusively or after hot caustic wash depending on truck contents. |
| Street man hole | Total plant effluent | Includes sanitary. |

Similarly, hot water rinse (not recycled) samples will be representative of one specific truck, thus more than one truck, should be sampled. Settling tank sludge samples may help characterize types of waste handled over a period of time. However, settling tank covers must be removed with a backhoe.

WASTE STREAM TREATABILITY

Pretreatment currently employed at Rogers Cartage consists of three underground 250-gallon settling tanks in series. The tanks are provided to allow settling of solids from the tanks for flow equalization. Sludge collected in the tanks is seldom removed. Operational practices at the facility require that caustic wastes are slowly bled to the treatment plant as opposed to batch discharge.

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| COMPONENT | Agency Contract: Jan Entry | DO NOT RELEASE |
| CLAIM | Date of Claim: August 1, 1982 | WITHOUT FOIA |
| ANSWER | Claim By: See para 11 | DETERMINATION |

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A hybrid wastewater treatment system for truck cleaning wastes investigated by Obrienated involved the following unit operations:

1. Oil separation--to remove oil/grease
2. Air flotation--to break emulsion and remove oil/grease/suspended solids
3. Chemical coagulation and pH adjustment--to aid in removal of suspended solids
4. Equilibration/sedimentation--allows separation of solids and prepares waste for further treatment
5. Mixed media filtration--to further remove solids/color
6. Carbon adsorption--to remove organics which may be toxic to biological systems
7. Rotating filter-biofiltration system--to remove degradable organics

This system was designed, however, for direct discharge to a receiving stream. For Rogers Cartage parameters of concern would be pH, floating oil/grease and toxic organic compounds. The existing physical/chemical treatment facility at Sauget should effectively adjust pH and reduce floating oils. The small quantity of toxic organic compounds discharged by Rogers Cartage will not pose a threat to the operation of the new regional biological treatment facility due to dilution. However, complex organic compounds may not be substantially removed by the new facility.

Although only activated carbon adsorption would be necessary to remove complex toxic organic compounds, a pretreatment scheme involving steps 1 through 6 described above would be required. Steps 1 through 5 would be necessary preliminary steps to prevent fouling of the carbon and increase bed life. The results of sampling studies conducted in February 1982 should be careful in making a final decision on whether pretreatment of Rogers Cartage wastewater will be necessary.

CER 127228

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| CONFIDENTIALITY | Agency Contact: Jon Batney | DO NOT RELEASE |
| CLASS | Date of Classification: August 1, 1982 | WITHOUT POLA |
| EXPIRATION | Class By: See page 11 | DETERMINATION |

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